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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

ORIGINAL
FILE

In the Matter of)	GEN Docket No. 90-314
)	ET Docket No. 92-100
Amendment of the Commission's)	
Rules to Establish New)	RM-7140, RM-7175, RM-7617,
Personal Communications)	RM-7618, RM-7760, RM-7782,
Services)	RM-7860, RM-7977, RM-7978,
)	RM-7979, RM-7980
)	
)	PP-35 through PP-40,
)	PP-79 through PP-85

REPLY COMMENTS

The Alliance of Rural Area LECs (hereafter "The Alliance"),^{1/} by its attorneys, and pursuant to Section 1.415 of the Federal Communications Commission's ("FCC" or "Commission") rules, hereby submits its Reply in the above-captioned proceeding.^{2/}

1. Numerous parties filed comments in this proceeding addressing the wide range of issues in response to the FCC's proposal to develop a regulatory framework for personal communications services ("PCS"). The Alliance members' primary concern in this docket is to

^{1/} A list of the companies participating in these Reply Comments is attached. These companies may also participate in this proceeding through comments filed by national telephone and/or cellular industry associations. Through these Reply Comments, the companies wish to emphasize their special concerns on particular subjects.

^{2/} Notice of Proposed Rulemaking and Tentative Decision, 7 FCC Rcd 5676 (1992) ("Notice"). These Reply Comments are timely filed. See, Order Extending Time for Reply Comments, DA 92-1600, released Nov. 24, 1992.

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ensure that PCS technology is made available to rural areas. These areas are often the last to reap the benefits of new technology; and yet, given the importance of communications in a rural, sparsely populated setting, they would benefit the most from advances in communications, such as those in wireless communications. Therefore, The Alliance's Reply Comments address the issues which are critical to the deployment of PCS in rural areas: eligibility requirements for PCS licenses, and the licensing scheme.

2. There is ample support in the comments for the Commission's proposal to allow local exchange carriers ("LECs") to obtain PCS licenses. LEC participation would indeed promote a more competitive environment for PCS. In rural areas, however, the issue is not whether there would be sufficient competition for PCS, but whether PCS would be available at all without the participation of LECs or their affiliates. Just as LECs serving rural areas are critical to the nationwide availability of local exchange service, so also is the inclusion of LECs in the eligibility for PCS necessary for the deployment of PCS in rural areas. The Alliance urges the Commission to ensure that these entities are permitted to participate in the licensing process.

3. The Alliance also supports a licensing scheme which will guarantee that rural areas are not overlooked in the licensing process, but rather are given the opportunity to benefit from the utility of PCS as a stimulant to economic activity in rural areas. Whether the Commission ultimately adopts a local licensing scheme,

e.g., following the cellular model and utilizing lotteries, or a national licensing scheme utilizing comparative hearings, the comments demonstrate that there is a need for a licensing plan for rural areas that provides incentives for the offering of PCS in the rural areas.

I. PCS ELIGIBILITY

4. The FCC recognizes that there is a "strong case" for permitting LECs to hold PCS licenses within their service areas. For example, their involvement would result in an improved telecommunications network, which in turn would benefit all PCS users, regardless of whose customers they are. (Notice at paragraph 75) The Alliance agrees with the Commission's recommendation that LECs be permitted to hold PCS licenses. The benefits of their participation far outweigh any perceived risk of anticompetitive behavior. The Alliance therefore urges the Commission to adopt rules which would guarantee LEC eligibility for PCS licenses, a position with considerable support among the commenting parties.^{3/}

^{3/} Comments of Alltel, Anchorage Telephone Utility, Bell Atlantic, BellSouth, Cellular Communications, CTIA, Centel Corporation, Century Cellunet, Chesnee Telephone Company, Cincinnati Bell, Citizens Utilities, Clear Creek Mutual Telephone Company, Concord Telephone, Home Telephone Company, Hughes Network Systems, Inc., Illinois Commerce Commission, Interdigital Communications, Kerrville Telephone, Lincoln Telephone & Telegraph, McCaw Cellular, NTRA and OPASTCO, NYNEX, Pacific Telesis, Palmetto Rural Telephone Cooperative, Piedmont Rural Telephone Cooperative, et al., Puerto Rico Telephone Company, Rochester Telephone, Rock Hill Telephone Company, et al., Roseville Telephone Company, Rural Cellular Corporation, Rural Independent Coalition, Small Rural Virginia Telcos, South Carolina Telephone Association, SNET, Southwestern Bell, Sprint, Taconic Telephone
(continued...)

5. Permitting LECs serving rural areas to provide PCS service in those areas will foster the Commission's goals for a PCS regulatory framework: universality, speed of deployment, diversity of services and competitive delivery. (Notice at paragraph 6) As commenting parties correctly point out, historically, LECs serving rural areas have fostered these goals. In so doing, they have played a critical role in the economic and social development of the communities which they serve.^{4/} The characteristics that are commonly associated with small, rural LECs are their efficient operation and quality service, their connection and commitment to their local communities, and thus their interest in spurring technology and growth.^{5/} Where they have been given an opportunity to participate in the delivery of new services, rural LECs have been a positive force for their deployment. The cellular experience bears this out. LECs typically constructed cellular facilities as soon as they were authorized to do so. In almost all instances, wireline cellular permittees in the Rural Service Areas ("RSAs") were operational before their non-wireline counterparts.^{6/} In view of the positive record of LEC participation

^{3/} (...continued)

Corporation, TDS, U.S. Small Business Administration, USTA, US West, Utilities Telecommunications Council.

^{4/} Comments of NTCA at 4-6, NRTC and OPASTCO at 12-13, Rural Independent Coalition at 4-8, Rock Hill Telephone et al. at 6-9.

^{5/} Comments of NTCA at 4-6

^{6/} This fact is a matter of Commission record. ETEX Telephone Cooperative, Inc.'s experience is illustrative. Its cellular affiliate, ETEX Cellular Co., Inc. (formerly Texas RSA 7B4, (continued...))

in services other than traditional wireline communications, their participation in PCS will undoubtedly be beneficial as well.^{7/}

6. The comments demonstrate that LEC involvement in PCS is the only means of ensuring that PCS is deployed in rural areas in a prompt and meaningful way. For that reason, many of the commenters specifically support eligibility for LECs despite their affiliation with a cellular entity in their service area.^{8/} The Alliance agrees, and urges the Commission not to exclude LECs serving rural areas from PCS eligibility on the basis of their affiliation with a cellular entity serving their area.

7. The most effective means of assuring meaningful participation of LECs serving rural areas in the PCS marketplace is to establish a spectrum set-aside for them. Wireless communications in conjunction with the landline network is of particular utility in

^{6/}(...continued)

Inc.), commenced operation of its cellular system in June, 1991. To date, the non-wireline cellular licensee is not providing service in the Texas RSA 7 partitioned area served by ETEX.

^{7/} Oneida County Rural Telephone Company ("OCR"), based in Holland Patent, New York and founded in 1903, is typical of Alliance members who have made available to their rural communities a variety of innovative communications services. OCR, through affiliates, has been a pioneer in investing in facilities to offer paging, competitive long distance and cellular services. All of the Alliance members have admirable records of performance and service quality.

^{8/} Comments of Chesnee Telephone Company, Cincinnati Bell, Citizens Utilities, Clear Creek Mutual Telephone Company, Home Telephone Company, NRTA and OPASTCO, NYNEX, Palmetto Rural Telephone Cooperative, Rock Hill Telephone Company, et al., Rural Independent Coalition, Small Rural Virginia Telcos, South Carolina Telephone Association, Taconic Telephone Corporation, USTA, US West.

rural areas where populations are dispersed over large geographical areas. In these areas, wireless communications can be an economical adjunct to the wireline network.^{9/} However, absent a spectrum set-aside in the licensing process for rural LECs to enable them to obtain a PCS license for such essential network services, as well as new wireless communications, it is likely that rural areas would be among the last to be recipients of PCS services. Due to their low population density, these are generally less economical, and hence, less attractive to serve.

8. The Commission should therefore reserve spectrum for rural LECs who desire to become PCS licensees. Viable set-asides for small, rural LECs have been proposed by commenters. The National Telephone Cooperative Association (NTCA), for instance, proposes that a block of frequencies at 2 GHz be set-aside "for each LEC in RSAs where the LEC provides telephone service" and that "this block be 'set-aside' for each LEC with 50,000 subscribers or less in MSAs where LECs of that size provide telephone service." (NTCA at 4) The Rural Independent Coalition (RIC) recommends a wireline set-aside which would expire after a specified amount of time and thereby address concerns about efficient use of the spectrum. (RIC at 6-7) Lincoln Telephone and Telegraph ("Lincoln") recommends that one of five licensed spectrum allocations be reserved for exchange carriers providing services within (RSAs). (Lincoln at 7) NRTA and OPASTCO similarly recommend

^{9/} See, e.g., Comments of USTA at 14, Rural Independent Coalition at 4-5, Lincoln Telephone and Telegraph at 7.

that the Commission reserve one of five blocks of spectrum for small, rural LECs. (NRTA/OPASTCO at 14) Rock Hill Telephone Company, et al. advocates reservation of spectrum for LECs serving RSAs. (Rock Hill at 11-12) The South Carolina Telephone Association ("SCTA") recommends reserving spectrum for LECs in RSAs and smaller LECs in MSAs. (SCTA at 10) These proposals recognize the value of LEC participation in the PCS market both to the rural areas, and to the FCC's goals for PCS nationwide. The Alliance strongly supports adoption of a spectrum set-aside for rural LECs.

II. LICENSING SCHEME

9. The Commission proposed three options of service areas, but tentatively concluded that the PCS service areas should be larger than those areas initially licensed in cellular (Notice at paragraph 60) Regardless of the service area size adopted by the Commission, e.g. nationwide, regional, etc., The Alliance strongly urges that there be

some mechanism in the licensing process which provides an opportunity for LECs to offer PCS in the rural areas. As noted herein, the comments demonstrate that LECs serving rural areas are well-positioned to provide PCS within their service areas, either to integrate it into the local network or to offer PCS as a stand-alone wireless service. The PCS licensing scheme should make use of LECs' utility in deploying PCS speedily, efficiently and universally by incorporating a spectrum set-aside for rural LECs or their affiliates.

Respectfully submitted,

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January 8, 1993

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Bristol Bay Telephone Cooperative, Inc. (Alaska)
Franklin Telephone Company, Inc. (Mississippi)
Delta Telephone Company, Inc. (Mississippi)
Mid-South Telecommunications Company, Inc. (Proposed purchaser of a
LEC in Kansas)
Eastex Telephone Cooperative, Inc. (Texas)
Topsham Telephone Company, Inc. (Vermont)
Skyline Telephone Membership Corporation (North Carolina)
Peoples Telephone Cooperative, Inc. (Texas)
Taylor Telephone Cooperative, Inc. (Texas)
Citizens Telephone Corporation (Indiana)
Liberty Cellular, Inc. d/b/a Kansas Cellular (Kansas)
(Owned by 29 rural area local exchange carriers or their affiliates)
ETEX Telephone Cooperative, Inc. (Texas)
Bledsoe Telephone Cooperative, Inc. (Tennessee)
Atlantic Telephone Membership Corporation (North Carolina)
Granite State Telephone, Inc. (New Hampshire)
Curtis Telephone Company (Nebraska)
Pioneer Telephone Association, Inc. (Kansas)
Oregon-Idaho Utilities, Inc. (Oregon & Idaho)
Rural Telephone Company (Idaho)
Project Mutual Telephone Cooperative Association, Inc. (Idaho)
New Paris Telephone, Inc. (Indiana)
Oneida County Rural Telephone Company (New York)
The Orwell Telephone Company (Ohio)
Union Telephone Company (Wyoming, Colorado, Utah)

**Alliance of Rural Area LECs
(Continued)**

The Ottoville Mutual Telephone Company (Ohio)

Northwestern Indiana Telephone Company, Inc. (Indiana)

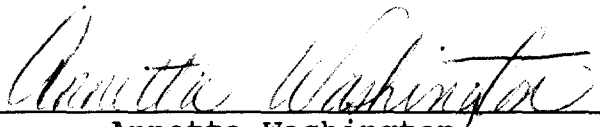
Hargray Telephone Company, Inc. (South Carolina)

Yorkville Telephone Cooperative, Inc. (Tennessee)

Filer Mutual Telephone Company (Idaho)

CERTIFICATE OF SERVICE

I, Annetta Washington, a secretary in the law offices of Lukas, McGowan, Nace and Gutierrez, Chartered, hereby certify, that I have on this 8th day of January 1993, sent via first class U.S. mail, a copy of the foregoing **REPLY COMMENTS** to the persons named on the attached list:


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